

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
---	------------------------------------

This document relates to: *Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al.*, 04-cv-1076 (GBD)(SN)

**MOTION TO ADD ADDITIONAL PLAINTIFFS AGAINST THE TALIBAN**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Jerry S. Goldman, Esq., along with the exhibit attached thereto, the O'Neill Plaintiffs, Plaintiffs added pursuant to the Court's May 4, 2022 Order (ECF No. 7949), and proposed Additional Plaintiffs in the above-captioned matter, by and through their counsel, respectfully move that this Court:

1. Order that the underlying complaint is deemed amended to add the seventy-one (71) plaintiffs listed in Appendix 1 starting at number 3,017 ("Additional Plaintiffs") as plaintiffs against the Taliban;
2. Order that the amendment supplements by incorporation into, but does not displace, the underlying complaint;
3. Order that prior service, orders, and judgments entered in the case remain in effect as to all parties;
4. Order that all parties are bound by all prior rulings made in this case, including the Court's prior order on service by publication, ECF Nos. 445, 488;
5. Order that Case Management Order #2, ECF No. 247, ¶ 12 applies to Additional Plaintiffs such that re-service of the Taliban is not required;

6. Order that Additional Plaintiffs shall file the Second Amended First Consolidated Complaint (*see* Exhibit A to the Declaration of Jerry S. Goldman, Esq.) as a stand-alone document within one week of this Order; and

7. Granting such other and further relief that the Court deems just and proper.

Dated: New York, New York  
June 14, 2022

Respectfully submitted,

/s/ Jerry S. Goldman

ANDERSON KILL P.C.

Jerry S. Goldman, Esq.

Hon. Ethan Greenberg (ret.)

Bruce E. Strong, Esq.

Alexander Greene, Esq.

1251 Avenue of the Americas

New York, NY 10020

Tel: (212) 279-1000

Fax: (212) 278-1733

Email: jgoldman@andersonkill.com

egreenberg@andersonkill.com

bstrong@andersonkill.com

agreene@andersonkill.com

*Attorneys for Plaintiffs*